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May 26, 2006

via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: SEIU COPE March Monthly Report (2/01/06-2/28/06)

Dear Ms. Lewis:

In your letter to SEIU COPE, dated April 26, 2006, you ask three questions regarding the above report.

The first question relates to receipts from Amalgamated Bank, N.A. reported on Line 17. This amount represents interest received from the bank for SEIU COPE funds on deposit with the bank. This will be a recurring transaction, although the monthly amount will vary.

Your second question involved a disbursement to SEIU PEA Fund reported on Line 29. The purpose of this disbursement was to transmit to SEIU PEA funds that were deposited into SEIU COPE's account in error. The original error occurred on 1/10/06 when funds intended for SEIU PEA Fund were deposited into SEIU COPE's bank account by mistake. That receipt was recorded on Line 17 of SEIU COPE's February Monthly Report. When the mistake was discovered, SEIU COPE disbursed \$12,000 to SEIU PEA Fund and reported that on Line 29 of the February Monthly Report. The February disbursement to SEIU PEA that you are inquiring about is actually an inadvertent duplicate reimbursement intended to rectify the same deposit error that was made in January. When this second error was discovered, SEIU PEA returned the \$12,000 of SEIU COPE funds that had been sent to them by mistake. This receipt from SEIU PEA is included on Line 17 of the May Monthly Report for SEIU COPE. In summary, SEIU COPE received \$12,000 in error, refunded that amount twice, and received a refund of the second \$12,000 so that on net, SEIU COPE has not received nor spent any money from this source.

Your third question involved a disbursement to Local 500 reported on Line 28(a). The purpose of this disbursement was to return contributions received from members of Local 500, an SEIU affiliate that acts as a collecting agent for SEIU COPE. The original receipt which was being returned by this disbursement were unitemized contributions from SEIU members and the amount was included on Line 11(a)(ii), and thus did not show up on any previous Schedule A.

Please feel free to contact me if you have any further questions

Sincerely,

John J. Sullivan
Associate General Counsel
Counsel for Government Affairs
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